

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In re:

KEYSTONE GAS CORPORATION

Debtor.

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§
§
§

Case No. 22-12088

Chapter 11

**MOTION FOR ENLARGEMENT OF TIME FOR DEBTOR TO FILE SCHEDULES,
STATEMENT OF FINANCIAL AFFAIRS, AND RELATED DOCUMENTS
WITH NOTICE OF OPPORTUNITY FOR HEARING**

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than seventeen (17) days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The seventeen (17) day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).

Please note that shortened notice has been requested contemporaneously herewith.

TO THE HONORABLE SARAH A. HALL,
CHIEF UNITED STATES BANKRUPTCY JUDGE:

Keystone Gas Corporation (“**Keystone**” or “**Debtor**”), debtor and debtor-in-possession in the above-referenced bankruptcy case, pursuant to Federal Rule of Bankruptcy Procedure (the “**Bankruptcy Rules**”) 1007(a)(5) and 9006(b)(1) and Local Rule of Bankruptcy Procedure (the “**Local Bankruptcy Rules**”) 9006-1(A), files this Motion for Enlargement of Time for Debtor to File Schedules, Statement of Financial Affairs, and Related Documents with Notice of Opportunity for Hearing (the “**Motion**”). In support of the Motion, the Debtor respectfully shows the Court as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b). This is a core proceeding and this Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The basis for relief requested herein are Bankruptcy Rules 1007(a)(5) and 9006(b)(1) and Local Bankruptcy Rule 9006-1.

II. BACKGROUND

3. On September 14, 2022 (the “**Petition Date**”), the Debtor filed its Voluntary Petition for bankruptcy under chapter 11 of the Bankruptcy Code initiating this bankruptcy case (the “**Chapter 11 Case**”). The Debtor continues to operate its business as debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No trustee, examiner, or official committee of unsecured creditors has been appointed.

4. Debtor’s Schedules, Summary of Assets and Liabilities, Declaration of Schedules, and Statement of Financial Affairs (collectively, the “**Schedules and Statements**”) are due to be

filed with the Court on September 28, 2022. The Section 341 meeting of creditors in this case is scheduled for October 24, 2022.

5. The Debtor filed one previous motion for enlargement of the time for the Debtor to file its Schedules and Statements on September 16, 2022 [Docket No. 11], which was stricken by the Court on September 19, 2022 for procedural reasons [Docket No. 12]. No other motions or applications for enlargement of the time for the Debtor to file its Schedules and Statements have been filed.

6. The Debtor requires additional time to fully prepare the Schedules and Statements and to locate older contracts and other documents kept in paper form.

7. By this Motion, the Debtor requests an additional fourteen (14) days, until October 12, 2022, to file its Schedules and Statements.

8. Debtor's counsel has conferred with Jeff Tate, counsel for the United States Trustee, who indicated that the United States Trustee is unopposed to the requested enlargement of time.

9. The Debtor has uploaded a proposed order contemporaneously with the filing of this Motion.

10. A shortened notice period is also requested contemporaneously with this Motion, as the current deadline to file Schedules and Statements, September 28, 2022, will occur before the expiration of the notice period of fourteen (14) days plus three (3) days for mailing, as required by the Court's June 15, 2015 Order Clarifying Response Deadline Applicable to Certain Requests for Relief and Bankruptcy Rule 9006(f).

III. APPLICABLE AUTHORITY

11. Bankruptcy Rule 1007(a)(5) states that the Court may extend the time allowed for a debtor to file the schedules and statement of financial affairs upon request of the debtor for cause and with notice to parties, including the U.S. Trustee. Fed. R. Bank. P. 1007(a)(5).

12. Likewise, Bankruptcy Rule 9006(b)(1) provides that, “when an act is required or allowed to be done at or within specified period by these rules or by notice given thereunder or by order of court, the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged if the request therefor is made by the expiration of the period originally prescribed....” Fed. R. Bank. P. 9006(b).

13. The Debtor respectfully requests additional time to file its Schedules and Statements, up to and including October 12, 2022, as allowed by Bankruptcy Rules 1007(a)(5) and 9006(b)(1). The Debtor requires this additional time to ensure that its Schedules and Statements are accurately prepared.

IV. NOTICE

14. As required by the Bankruptcy Rules and Local Rule 1007, notice of this Motion will be provided to the United States Trustee, as well as all creditors listed on the court’s mailing matrix in this case, all parties who have filed a notice of appearance in this case, all parties requesting notice through the Court’s ECF electronic noticing system, set forth more specifically in the attached Certificate of Service. No committee has been appointed under §1102 of the Code, and no trustee or examiner has been appointed. Notice of an extension shall be given to the United States Trustee and to any committee, trustee, or other party as the court may direct.

V. RELIEF REQUESTED

WHEREFORE, Debtor respectfully requests an enlargement of time, up to and including October 12, 2022, to file its Schedules and Statements, and such other and further relief as the Court deems just and equitable.

Dated: September 22, 2022

Respectfully submitted,

/s/ Courtney D. Powell

Courtney D. Powell, OBA No. 19444

SPENCER FANE LLP

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Oklahoma City, Oklahoma 73114

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Facsimile: (405) 844-9958

Email: cpowell@spencerfane.com

**PROPOSED COUNSEL FOR DEBTOR
AND DEBTOR-IN-POSSESSION**

CERTIFICATE OF CONFERENCE

I hereby certify that, on September 15, 2022, Spencer Fane LLP attorneys Megan Clontz and Jason Kathman conferred with Jeff Tate, attorney for the United States Trustee, by telephone regarding the extension requested herein. Mr. Tate indicated that the United States Trustee is not opposed to an extension to file Schedules and Statements through and including October 12, 2022.

/s/ Courtney D. Powell

Courtney D. Powell, OBA No. 19444

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**PROPOSED COUNSEL FOR DEBTOR
AND DEBTOR-IN-POSSESSION**

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:)
)
KEYSTONE GAS CORPORATION,) **Case No. 22-12088**
)
Debtor.)

CERTIFICATE OF SERVICE

This is to certify that on the 22rd day of September, 2022, I caused a true and correct copy of the *Motion for Enlargement of Time for Debtor to File Schedules, Statement of Financial Affairs, and Related Documents with Notice of Opportunity for Hearing*, filed on September 22, 2022, to be served upon the following parties via U.S. First Class Mail on September 23, 2022:

Keystone Gas Corporation, PO Box 1156, Drumright, OK 74030-1156
USBC Western District of Oklahoma, 215 Dean A. McGee, Oklahoma City, OK 73102-3426
ADT Security Services, 3190 S. Vaughn Way, Aurora CO 80014-3541
AT&T, 208 S. Akard Street, Dallas TX 75202-4206
Airgas USA, LLC, P.O. Box 734671, Dallas TX 75373-4671
Ally Bank, P.O. Box 380902, Minneapolis MN 55438-0902
Alvin Rusco, 45210 West Hwy 51, Jennings OK 74038-2516
Arco Environmental Remediation, LLC, 1701 Summit, Suite 2, Plano TX 75074-8175
Baker Hughes Oilfield Inc., 1333 Corporate Drive #300, Irving TX 75038-2535
BankDirect Capital Finance, 150 North Field Drive, Suite 190, Lake Forest IL 60045-2594
Battery Outfitters, P.O. Box 215, Golden MO 65658-0215
Brandon & Regina Brunner, 7222 S. Fairgrounds Road, Stillwater OK 74074-6172
Caterpillar Financial Services Corporation, 2120 West End Avenue, Nashville TN 37203-5341
Charles Lindsey Riddle, 43747 West 131st Street, Bristow OK 74010-9527
Circle 9 Resources LLC, 1833 S Morgan Rd, Oklahoma City, OK 73128
City of Yale, 209 N. Main Street, Yale OK 74085-2509
Clyde Matheson Jr. & Nancy C. Trust, 2208 S. Council Creek Road, Stillwater OK 74074-7096
Community Care, P.O. Box 3249, Tulsa OK 74101-3249
Creek County Treasurer, 317 E. Lee, Room 201, Sapulpa OK 74066-4325
Dan A. and Geraldine L. Simonton, 48098 W. 131st Street South, Drumright OK 74030-5515
Davco Fab, P.O. Box 361, 921 North Main, Jennings OK 74038-0361
De Lange Landen Financial Services, Inc., 1111 Old Eagle School Road, Wayne PA 19087-1453
Dell Financial Services, P.O. Box 81577, Austin TX 78708-1577
Department of the Army, U.S. Army Corp. of Engineers, 5722 Integrity Drive, Millington TN 38054-5028
Dexxon Yarhola, 732 Indiana Avenue, Kiefer OK 74041-4541
Earl-Le Dozier, LLC, P.O. Box 351, 512 W. Highway 33, Drumright OK 74030-0351
Fowler of Tulsa C LLC, c/o Michael S. Fowler, 2721 NW 36th Avenue, Norman OK 73072-2411

Frank & Tonya Magness, 7200 E. Deep Rock Road, Cushing OK 74023-2994
Gungoll, Jackson, Box, Devoll, PC, P.O. Box 1549, Enid OK 73702-1549
Harris Oil Co., Inc., Drawer 112, Cushing OK 74023-0112
Indian Electric Coop, 2506 E. Highway 64, Cleveland OK 74020-4054
Industrial Oils Unlimited, P.O. Box 3066, Tulsa OK 74101-3066
Internal Revenue Service, Centralized Insolvency Operation, P.O. Box 7346, Philadelphia PA 19101-7346
J.J. & K. Oil Company LLC, 114 NW 8th Street, Oklahoma City OK 73102-5805
Jacam Chemicals 2013 LLC, 205 S. Broadway, P.O. Box 96, Sterling KS 67579-0096
James J. Hodgens, PC, P.O. Box 686, 301 West Main Street, Stroud OK 74079-3611
Jaye Wilson, 3166 Old Hwy 52 South, Pilot Mountain NC 27041-7114
Jeremy W. Tillery, 320 West Web Street, Glencoe OK 74032-1466
Joe Waters, P.O. Box 70, Luther OK 73054-0070
Larry & Sheila Martin, 346751 E 4200 Rd, Pawnee OK 74058-3418
Levinson Smith & Huffman P.C., 1743 East 71st Street, Tulsa OK 74136-5108
Lincoln County Land Office, 811 Manvel Avenue, Suite 5, Chandler OK 74834-3800
Lincoln County Treasurer, 811 Manvel Avenue #6, Chandler OK 74834-3800
Little River Energy Co., 1260 E. Broadway Street, Drumright OK 74030-5903
Logan County RWD #3, P.O. Box 187, Marshall OK 73056-0187
Logan County Treasurer, Logan County Courthouse, 301 E. Harrison Avenue #100, Guthrie OK 73044-4939
Marjorie J. Creasey on behalf of U.S. Trustee United States Trustee, Office of the United States Trustee, 215 Dean A. McGee, Room 408, Oklahoma City, OK 73102
Mark Lauderdale Enterprise, 3215 E. Deep Rock Road, Cushing OK 74023-6425
Marle Production Co. LLC, 5310 E. 31st Street, Suite 900, Tulsa OK 74135-5018
Max Haken Glenco, 9815 N. Bethel Road, Glencoe OK 74032-1500
Measurement Solutions, Inc., 6705 E. 81st Street, Suite 156, Tulsa OK 74133-4129
Memorial Machine, 6303 S. 40th West Avenue, Tulsa OK 74132-1200
OGE Energy Corp., P.O. Box 321, Oklahoma City OK 73101-0321
Oakland Petroleum Operating, 7318 S. Yale Avenue, Suite B, Tulsa OK 74136-7000
Office of Natural Resources Revenue, 6525 N. Meridian Avenue, Suite 270, Oklahoma City OK 73116-1420
Okie 811, 6908 N. Robinson Avenue, Oklahoma City OK 73116-9041
Oklahoma One Call System Inc., 6908 N. Robinson Avenue, Oklahoma City OK 73116-9041
Oklahoma Tax Commission, General Counsel's Office, 100 N Broadway Ave Suite 1500, Oklahoma City OK 73102-8601
Pawnee County Assessor, 500 Harrison Street #201, Pawnee OK 74058-2568
Payne County Rural Water District #2, 8910 S Perkins Rd, Stillwater, OK 74074
Payne County Treasurer, 315 W. 6th Avenue, Stillwater OK 74074-4079
Pitney Bowes, 2225 American Drive, Neenah WI 54956-1005
Pitney Bowes, c/o McCarthy, Burgess & Wolff, 26000 Cannon Road, Cleveland OH 44146-1807
RCB Bank, Attn. Special Assets, 300 W Patti Page Blvd, Claremore OK 74017-8039
RSI, Inc., P.O. Box 1829, Seminole OK 74818-1829
Scott P. Kirtley, Riggs, Abney, Neal, Turpen, Orbison & Lewis, 502 West 6th Street, Tulsa, OK 74119-1016
Suddenlink, 200 Jericho Quadrangle, Jericho NY 11753-2701

Superior Pipeline, P.O. Box 702500, Tulsa OK 74170-2500
United States Trustee, 215 Dean A. McGee Ave., 4th Floor, Oklahoma City, OK 73102-3479
Walt Pettit, 705 E Yuma Dr, Broken Arrow OK 74011-7297
Waukeshan-Pierce Industries, LLC, P.O. Box 204116, Dallas TX 75320-4116
Yarhola Production Company, 1209 E. Bdwy, Drumright OK 74030
Courtney D. Powell, Spencer Fane LLP, 9400 N. Broadway Extension, Oklahoma City, OK 73114-7451

This is to further certify that on the 22nd day of September, 2022, a true and correct copy of the *Motion for Enlargement of Time for Debtor to File Schedules, Statement of Financial Affairs, and Related Documents with Notice of Opportunity for Hearing*, filed on September 22, 2022, was served to the following parties via the Court's ECF electronic transmission facilities upon the following parties:

Kevin P Doyle on behalf of Creditor Southern Kentucky Energy, LLC
kdoyle@praywalker.com, jcannon@praywalker.com

Courtney D. Powell on behalf of Debtor Keystone Gas Corporation
cpowell@spencerfane.com, llanon@spencerfane.com;lvargas@spencerfane.com

Jeffrey E Tate on behalf of U.S. Trustee United States Trustee
jeff.tate@usdoj.gov, lynnrene.diamond@usdoj.gov;michele.adams@usdoj.gov

Scott P. Kirtley on behalf of RCB Bank
skirtley@riggsabney.com

United States Trustee
Ustpreion20.oc.ecf@usdoj.gov

/s/ Courtney D. Powell

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**PROPOSED COUNSEL FOR DEBTOR
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